

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division

Comments

Draft Phase I RFI/RI Report
Operable Unit No 15 Inside Building Closures, August 1994

GENERAL COMMENTS

Beryllium Contamination - This report concludes that beryllium contamination at IHSSs 179 and 180 is not directly attributable to waste materials stored at the IHSSs and will be addressed as a "building-wide" issue. The report further states that the appropriate approach to addressing the beryllium contamination is under the economic redevelopment and D&D programs at RFP. The National Conversion Pilot Project (NCP) submitted a draft IM/IRA PP to the Division which addresses the economic redevelopment of the buildings containing both IHSSs 179 and 180. In that document the DOE proposes to isolate and address contamination associated with the IHSSs independent of the NCP. The NCP proposal directly contradicts the statements in this draft report. Responsibility for beryllium contamination at these IHSSs must be fully acknowledged and clearly documented by the DOE. The generic transfer of responsibility to "on-going building operations" is not sufficient.

Current Land Use - The Division requests clarification as to the current land use under which the DOE has classified the IHSSs within OU15. Specifically, do the standards cited under the current land use require radiation control area and/or radiation worker standards to be in place or are the standards based on unrestricted industrial use.

SPECIFIC COMMENTS.

Sections 2.2 through 2.7 - The description of each IHSS in the Historical Use of IHSS sub-sections of sections 2.2 through 2.7 should state if the IHSS is in a radiation or beryllium control area, and present a brief rationale for the area posting.

Section 4.2.3, page 19 - The bullet describing chi squared results for IHSS 178 at the top of this page states that random theory is valid at a 99 percent confidence level, but not a 95 percent confidence level. This statement does not make sense, if you are 99 percent confident in a result then you must also be 95 percent confident in that same result. Additionally, the critical value for all confidence intervals cited must be reported in this section.

Section 5.0, page 1 - This section should also state that an electronic copy of the analytical data has been distributed to the Agencies with the report.

Section 5.1 - In this section the DOE claims that butyl benzyl phthalate detections in hot water rinsate are attributable to plastic in the sampling equipment and in flooring materials. Based on the sampling results presented in the report, butyl benzyl phthalate is not associated with the sampling equipment. Butyl benzyl phthalate was not detected in hot water rinsate equipment blank samples and was only detected in verification sampling at one IHSS. All references to butyl benzyl phthalate being associated with sampling equipment must be removed from this report.